

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CRAIG CUNNINGHAM

§  
§  
§  
§

v.

CIVIL ACTION NO. 5:22-cv-363-OLG

WATTS GUERRA, LLP; et al.

**AFFIDAVIT OF DONNA COUTU**

STATE OF MONTANA

\*  
\*  
\*

COUNTY OF FLATHEAD

I, Donna Coutu, being duly being sworn on oath, depose, state, and declare as follows:

1. I am over 18 years of age, and I am of sound mind and capable of making this affidavit. I have personal knowledge of the facts stated in this affidavit and affirm that they are true and correct.
2. I am the Controller for Watts Guerra.<sup>1</sup>
3. Among other responsibilities, I oversee the Watts Guerra's daily accounting operations and finance activities, including but not limited to general accounting, payroll, accounts payable and receivable departments.
4. This Affidavit is submitted in support of Defendants' Motion for Summary Judgment.
5. As Controller of the Accounting Department for Watts Guerra, I conducted (or oversaw) a thorough search of the firm's financial records and did not find a single payment made by or through the firm to Berken Media, LLC, Robert Kenyon, gurusagent.com, Consumer Case Helpline, Susana Valenzuela, and/or Ana

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<sup>1</sup> For purposes of this Affidavit, "Watts Guerra" means Watts Guerra LLP and all of its offices and affiliates.

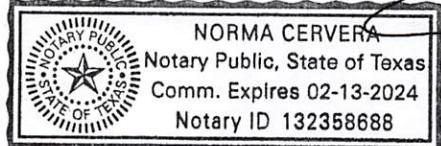
Gutierrez.

6. As Controller of the Accounting Department for Watts Guerra, I thoroughly searched our databases and did not locate any bill, invoice or payment request from or to Berken Media, LLC, Robert Kenyon, gurusagent.com, Consumer Case Helpline, Susana Valenzuela, and / or Ana Gutierrez.

7. Watts Guerra has no payables vendor relationship with Berken Media, Robert Kenyon, GurusAgent.com, and Consumer Case Helpline.

Further, Affiant saith naught.

Dated this 13<sup>th</sup> day of June 2022.



Donna Coutu  
Donna Coutu

Subscribed and sworn to before  
me this 14<sup>th</sup> day of June 2022.

Norma Cervera  
Notary Public – Texas  
My Commission Expires: 02-13-2024